

Modern Slavery Statement 2023

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1. Introduction

The Modern Slavery Statement is made on behalf of the following reporting entities:

- Just Eat Limited
- Just Eat Holding Limited
- Just Eat.co.uk Limited

Throughout this statement, we refer to these entities, collectively, as “Just Eat”.

This statement is submitted as a *joint statement* on behalf of the above reporting entities pursuant to section 54 of the UK Modern Slavery Act 2015 1 January 2023 to 31 December 2023.

We take the issue of modern slavery seriously. We will not tolerate modern slavery in any form within our business or our supply chains. We truly believe that valuing and caring for human rights is not only critical to the sustainable operation of our business but also contributes to the recognition of such rights whilst also being a force for good.

2. Our Business

Just Eat, as part of the Just Eat Takeaway.com group of companies, operates a hybrid marketplace for online food delivery, combining our marketplace offering with our courier delivery service. We provide proprietary technology to offer a quick and efficient digital ordering service to connect millions of customers with our restaurant partners in the United Kingdom and in other countries around the world. Just Eat is not a food producer or retailer.

The restaurants on our platform are not owned by Just Eat and the vast majority are small, independent restaurants or small chains although we do also work with national and international branded restaurant groups. Our customer base is broad and comes from all walks of life, ordering takeaway at home, in the office or with friends, whenever or wherever they are. The vast majority of orders in the UK are delivered to customers' doors by our independent restaurant partners' own couriers.

3. Our Company Structure

Just Eat is a proud part of the global Just Eat Takeaway.com, a leading global online food delivery marketplace, headquartered in Amsterdam. We connect 84 million active consumers with 699 thousand local partners through our apps and websites, and with leading positions in many countries. As of 31 December 2023, Just Eat Takeaway.com operates in 20 countries, divided into four segments: North America (Canada and the United States), Northern Europe (Austria, Belgium, Denmark, Germany, Luxembourg, Poland, Slovakia, Switzerland, and the Netherlands), United Kingdom and Ireland, and Southern Europe and ANZ (Australia, Bulgaria, France, Israel, Italy, New Zealand, and Spain).

Just Eat Limited is wholly owned by Just Eat Takeaway.com N.V., a company domiciled and registered in the Netherlands. Just Eat Takeaway.com N.V. is listed on Euronext Amsterdam and the London Stock Exchange. Just Eat Holding Limited is a wholly owned direct subsidiary of Just Eat Limited, Just Eat.co.uk Limited is a wholly owned direct subsidiary of Just Eat Holding Limited, and Just Eat (Acquisitions) Pty Limited is a wholly owned direct subsidiary of Just Eat (Acquisitions) Holding Limited.

4. Our Operations

Just Eat is the UK's leading food delivery company with over 76,000 restaurant, grocery and convenience partners, servicing 19 million consumers across 97 per cent of UK postcodes. It continues to operate from Fleet Place House, 2 Fleet Pl, London EC4M 7RF, United Kingdom, with large local teams spanning procurement, internal communications, sales, operations, business responsible, finance, analytics, product and technology, etc.

Regarding our workforce, with the exception of our field sales teams, the majority of our people worked based on JET's hybrid working policy.

Just Eat, during 2023 used delivery to complement our marketplace model, enabling us to give customers the widest possible choice. Since the start of the pandemic we have seen huge growth in our delivery operations and it now forms a core part of wider business. We utilise four different delivery models across the group:

- Self delivery - Just Eat is predominantly a marketplace, which means in the majority of cases, the couriers who deliver customers' food to the door are engaged or employed by independent restaurants
- Independent contractor couriers - provides couriers with flexibility on how and when they want to work, depending on the demand
- Third party - Couriers are engaged by the third party as self-employed independent contractors

In May 2023, we ceased to operate the employed courier model in the UK to reduce complexity, improve economics and create a level playing field with our competitors. Our independent contractor courier model is quickly scalable and provides couriers with flexibility on how and when they want to work. This flexibility allows us to match supply with demand to capture growth and optimise costs as conditions change due weather, events or seasonality.

This model is currently operating in, amongst others, Australia, Canada, the UK, and the US, with more than 75% population coverage in our largest markets. In addition to our proprietary delivery models, we also use third-party delivery companies or agencies in certain locations or markets. Throughout 2023, we have streamlined our offering by reducing our dependence on third-party providers to further optimise our network, improve stakeholder experience, and control costs.

5. Our Supply Chain

Just Eat primarily has suppliers in the UK, however we also engage with suppliers in the US, The Netherlands, and some of these suppliers manufacture in China and Bangladesh.

Just Eat procures services to support its business needs, such as software, advertising, marketing, call centre services, payment services, IT hardware , office real estate, packaging for restaurants, courier equipment, telecom and technology services.

6. Our Governance and Policies

In May 2023, Claire Pointon took over from Andrew Kenny, as Managing Director. She reports into Andrew Kenny, now Chief Commercial Officer (CCO) and part of Just Eat Takeaway.com NV Management Board.

To support our modern slavery commitments, we had a Code of Conduct which set out the ethical standards we expected of our staff and integrity expectations for suppliers to meet and underlined our commitment to acting ethically and with integrity in all our business relationships. All company policies were made available to our people on the Kitchen (Just Eat Takeaway.com's internal communication site). The Code of Conduct is also available for our partners and suppliers on the corporate website - www.justeattakeaway.com

In order to reinforce its commitment to prevent conduct that may foster modern slavery, Just Eat Takeaway.com has included in its Code of Conduct specific references to the organisation's zero tolerance to modern slavery, not only among its employees, but also in its supply chain.

Also, Just Eat Takeaway.com encourages every employee and suppliers, through its Code of Conduct, to report any misconduct including any form of modern slavery.

7. Our Speak Up Culture

Your voice matters - Speak Up! This is our motto and we encourage our employees and third parties to Speak Up about any (suspected) wrongdoing or anything unethical or simply not aligned with our Code of Conduct.

We maintain an independent third-party, multilingual Speak Up hotline that operates 24/7, 365 days a year, where anyone, whether it's an employee, an independent contractor, a supplier, a Restaurant, Grocery or Convenience Partner, a shareholder, a customer, or a relative of any of the above, can raise a concern or report a (suspected) wrongdoing. Any report can be made anonymously. Cases raised through the hotline went directly to the Ethics & Compliance team. The team was responsible for reviewing each case received via the hotline and assigning an appropriate investigator (where the issue was not investigated by the Ethics & Compliance team themselves). Just Eat Takeaway.com publishes their Speak Up hotline through its Code of Conduct and its Speak Up Policy. The Policy and the hotline link are available via intranet, the corporate website and on all platform's websites. Three reports relating to allegations of modern slavery or other human rights violations were received via the Speak Up hotline in The United Kingdom in 2023. The reports were handled by local teams and the local authorities.

8. Risks of modern slavery practices in the operations and supply chains

Just Eat takes seriously the potential for modern slavery risks within our business.

We carry out human rights' risk assessment of Just Eat Takeaway.com's supply chain based on the geography where a good or service is physically produced in, and evaluate the geography's modern slavery risk using a scoring mechanism for the likelihood of modern slavery in each country of production. This is important as most of our direct (tier 1) suppliers outsource the manufacture of goods to another third party, so assessing our tier 1 supplier would not be sufficient.

We concluded that goods produced for Just Eat Takeaway.com in countries such as China and Bangladesh represent the highest risk of modern slavery to JET's supply chain.

The human rights assessments enable us to understand the end manufacturing location of the goods and services that Just Eat Takeaway.com source. We categorise high risk geographies using a scale of likelihood of modern slavery risk in that country and region, and similarly, categorise industry risk where there is a higher degree of labour intensive production and low skilled labour.

Scores for the 2 assessments listed above were combined and a final score reflecting the modern slavery risk of that supplier was allocated and subsequent risk criticality ratings were applied.

Accordingly, we found that factory-based manufacturing of IT hardware, and courier equipment like textiles, which are also produced in the high-risk geographies, are the categories with greatest risk of modern slavery to Just Eat Takeaway.com and Just Eat.

We had, and continue to have a zero tolerance approach to the imposition of any financial burdens, as outlined in our Code of Conduct, such as withholding wages or imposing recruitment fees, within our business and supply chains. In the event that allegations of this nature are brought to our attention, we would take swift and appropriate steps to investigate and address this.

9. Actions taken to assess and address modern slavery risks

Procurement managed suppliers are taken through a Just Eat Group approved process. At supplier selection, this step includes engagement with Infosec, Data Protection, and Ethics, with mandatory risk-related questions. Sourcing governance and sustainability make up a significant weighting using our scorecard when aligning vendor selection. JET holds contracts that can be either short term, longer terms of 36 months, or evergreen.

Beginning in 2023, our mitigation plan with the identified high-risk suppliers has consisted of growing our mandatory desk-based sustainability (social) audits to determine if our suppliers have suitable labour and human rights policies and practices. Currently 60% of very high-high risk modern slavery suppliers have undergone EcoVadis or BCorp assessment. This has been combined with the launch of on-site audits to be carried out by a third party auditor that addresses a range of social and health & safety issues within the factory to help ensure workers in our value chain are protected.

Just Eat Takeaway.com chose an independent third-party audit partner to carry out the on-site social and health and safety audits on our behalf. The audit partner was chosen through a diligent vetting process which required them to share their own practices that mitigate against bribery & corruption and help ensure integrity in the auditing process.

We have now completed audits of our current highest risk category factories (restaurant order pads and courier equipment goods) and are now working with the factories and independent auditor to remedy the non-conformances found. We are now aiming to begin the process with our next highest risk categories (e.g Sponsorships and employer brand goods). We plan to re audit factories on an annual basis.

Given that many products we source are produced in China where Uyghur forced labour exists, we have also added a Modern Slavery Clause to our Goods' contract template that prevents suppliers from operating, or trading with any third party that operates in regions that are subject to modern slavery bans, such as the Xinjiang region of China.

Additionally, we trained our new employees on how to recognise and report modern slavery. The onboarding Code of Conduct eLearning course included examples of modern slavery warning signs, and our people were directed to either inform the Ethics & Compliance team or report to the Speak Up hotline immediately if they observed any such warning signs.

10. Assessing the Effectiveness of Actions Being Taken to Assess and Address Modern Slavery Risks

Having now carried out on-site audits at these highest risk factories, we have a baseline to measure against and through annual re-auditing, expect to see our factories improve their scores each year.

Factories must also complete the Corrective Action Plans with the independent auditor and if a factory has failed, they must additionally undergo a follow up re-audit to be eligible for further Just Eat Takeaway.com orders.

Out of 28 factories that have completed the human rights social and health and safety audit, 8 factories have failed to meet our high standards. 3 factories have failed for serious non-conformances in the child and forced labour topic. As above, all factories that fail the audit, must complete the corrective action plan with the auditor, then undergo and pass a re audit. Only after these two points have been met, will Just Eat Takeaway.com re-order from the factory.

11. Consultation

Relevant business units of Just Eat and Just Eat Takeaway.com have been consulted for the preparation of this statement. Just Eat undertook regular consultation and shared learnings internally with representatives of the various teams across Just Eat Takeaway.com.

11. Modern Slavery Statement Approval

This statement was approved and signed by Claire Pointon as the principal governing body of each of the reporting entities on the 2nd of July, 2024.



Claire Pointon
Managing Director UK
Just Eat Limited
Just Eat Holding Limited
Just Eat.co.uk Limited